

**IN THE UNITED STATES OF AMERICA  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

Carmen Purl, M.D.; and Carmen Purl,  
M.D., PLLC d/b/a Dr. Purl's Fast Care  
Walk In Clinic,

*Plaintiffs,*

v.

United States Department of Health and  
Human Services; Xavier Becerra, in his  
official capacity as Secretary of the  
United States Department of Health and  
Human Services; Office for Civil Rights  
of the United States Department of  
Health and Human Services; and Melanie  
Fontes Rainer, in her official capacity as  
Director of the Office for Civil Rights of  
the United States Department of Health  
and Human Services,

*Defendants,*

and

City of Columbus, Ohio; City of  
Madison, Wisconsin; and Doctors for  
America,

*Proposed Intervenor-  
Defendants.*

Civil Action No. 2:24-cv-00228

**PROPOSED INTERVENOR-DEFENDANTS' RESPONSE IN OPPOSITION  
TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.4, Proposed Intervenor-Defendants the City of Columbus, Ohio, the City of Madison, Wisconsin, and Doctors for America oppose Plaintiffs' Motion for Summary Judgment on Counts I and II of their Complaint (ECF 1). This Response is supported by Proposed Intervenor-Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Summary Judgment, which sets

forth the arguments and authorities on which Intervenor-Defendants rely and contains the matters required by Local Rule 56.4.

Date: March 3, 2025

Respectfully submitted,

/s/ Shannon R. Selden

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2025, a copy of the foregoing was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/ Shannon R. Selden  
Shannon Rose Selden